MUNROFIN (PTY) LTD

(Registration Number: 2017/290148/07)

("Munrofin")

PAIA MANUAL

In terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA")

Version 2 | Updated: November 2026 | First compiled: June 2026

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1. INTRODUCTION

Munrofin (Pty) Ltd is a private company registered in terms of the laws of the Republic of South Africa. It provides accounting, bookkeeping, payroll, tax, business advisory and business registration services. This Manual is published in terms of section 51 of PAIA and, in respect of the Processing of Personal Information, section 18 and related provisions of POPIA.

2. LIST OF ACRONYMS AND ABBREVIATIONS

Acronym / term	Meaning
"FIC Act"	Financial Intelligence Centre Act 38 of 2001.
"Guide"	The guide on how to use PAIA and POPIA published by the Regulator in terms of section 10 of PAIA.
"IO"	Information Officer.
"Manual"	This PAIA Manual, together with its annexures, as amended from time to time.
"Minister"	Minister of Justice and Constitutional Development.
"Munrofin"	Munrofin (Pty) Ltd, registration number 2017/290148/07, with its registered address at 1015 Draaibos Avenue, Weltevredenpark X45, Roodepoort, 1709.
"PAIA"	Promotion of Access to Information Act 2 of 2000, as amended.
"Personal Information"	Information relating to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person, as defined in section 1 of POPIA.
"POPIA"	Protection of Personal Information Act 4 of 2013.
"Regulator"	Information Regulator (South Africa).
"Republic"	Republic of South Africa.

3. PURPOSE OF THIS PAIA MANUAL

This Manual helps the public to:

3.1 identify the categories of records held by Munrofin that are available without a formal PAIA request;

3.2 understand how to request access to a record, with a description of the subjects on which Munrofin holds records and the categories of records held on each subject;

3.3 know which records Munrofin holds in accordance with other legislation;

3.4 obtain the contact details of Munrofin's Information Officer;

3.5 know about the Guide and how to obtain it;

3.6 know the purposes for which Munrofin Processes Personal Information, the categories of Data Subjects and of Personal Information, and the recipients of the information;

3.7 know whether Munrofin transfers Personal Information outside the Republic; and

3.8 know the security measures Munrofin has in place to protect Personal Information.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Company details

Name of company	Munrofin (Pty) Ltd
Registration number	2017/290148/07
Director	MJ Munro (sole director)
Street address	1015 Draaibos Avenue, Weltevredenpark X45, Roodepoort, 1709
Postal address	1015 Draaibos Avenue, Weltevredenpark X45, Roodepoort, 1709
Telephone	082 315 3350
E-mail	jhb@munrofin.co.za
Website	https://munrofin.co.za

Information Officer

Name	MJ Munro
Telephone	082 315 3350
E-mail	maryna@munrofin.co.za
Address	1015 Draaibos Avenue, Weltevredenpark X45, Roodepoort, 1709

No Deputy Information Officer has been designated. All requests must be addressed to the Information Officer.

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN IT

5.1 The Regulator has, in terms of section 10(1) of PAIA, updated and made available the Guide in an easily understood form, to assist anyone who wishes to exercise a right under PAIA or POPIA.

5.2 The Guide is available in each of the official languages of the Republic and in braille.

5.3 The Guide describes, among other things:

- the objects of PAIA and POPIA;
- the contact details of the Information Officer of every public body and of Deputy Information Officers designated by public and private bodies;
- the manner and form of a request for access to a record of a public body (section 11) and of a private body (section 50);
- the assistance available from Information Officers of public bodies and from the Regulator;
- the remedies available under PAIA and POPIA, including an internal appeal (which applies to public bodies only), a complaint to the Regulator, and an application to court;
- the provisions requiring public and private bodies to compile a manual (sections 14 and 51), and on voluntary disclosure of records (sections 15 and 52);
- the notices regarding fees (sections 22 and 54); and the regulations made under section 92.

5.4 Members of the public may inspect or copy the Guide at the offices of public and private bodies, including the office of the Regulator, during normal working hours.

5.5 The Guide may also be obtained from the Information Officer on request, or from the Regulator's website, www.inforegulator.org.za.

6. RECORDS AVAILABLE WITHOUT A REQUEST

6.1 Records that are in the public domain, such as information on Munrofin's website, may be accessed without a formal PAIA request.

6.2 Other non-confidential records, such as Munrofin's statutory records filed with the Companies and Intellectual Property Commission (CIPC), may also be accessed without a formal PAIA request, either from CIPC or by e-mail request to the Information Officer.

7. RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION

Munrofin holds records in terms of the following legislation, as amended from time to time, among others:

7.1 Basic Conditions of Employment Act 75 of 1997;

7.2 Companies Act 71 of 2008;

7.3 Compensation for Occupational Injuries and Diseases Act 130 of 1993;

7.4 Electronic Communications and Transactions Act 25 of 2002;

7.5 Employment Equity Act 55 of 1998;

7.6 Financial Intelligence Centre Act 38 of 2001;

7.7 Income Tax Act 58 of 1962;

7.8 Labour Relations Act 66 of 1995;

7.9 Occupational Health and Safety Act 85 of 1993;

7.10 Promotion of Access to Information Act 2 of 2000;

7.11 Protection of Personal Information Act 4 of 2013;

7.12 Skills Development Act 97 of 1998;

7.13 Skills Development Levies Act 9 of 1999;

7.14 Tax Administration Act 28 of 2011;

7.15 Trust Property Control Act 57 of 1988;

7.16 Unemployment Insurance Act 63 of 2001;

7.17 Unemployment Insurance Contributions Act 4 of 2002;

7.18 Value-Added Tax Act 89 of 1991;

8. SUBJECTS AND CATEGORIES OF RECORDS HELD

The table below describes the subjects on which Munrofin holds records and the categories of records held on each subject. These records are not automatically available. A request for access may be refused on any of the grounds in section 11 of this Manual.

Subject	Categories of records
Statutory records	• Incorporation documents and Memorandum of Incorporation • Securities (share) register • Minutes and resolutions of the director and shareholders • Records of the appointment of directors, auditors and other officers

Subject	Categories of records
Client records	• Client files, engagement letters and correspondence • Accounting records, working papers, management accounts and annual financial statements • Tax returns, assessments and SARS correspondence • Payroll records processed for clients • CIPC filings and company secretarial records of clients • Trust records • Client due diligence (FICA) records, risk assessments and sanctions screening records
Tax	• PAYE records and documents issued to employees for tax purposes • Records of payments to SARS • VAT, Skills Development Levy and UIF records • Other statutory tax compliance records
Human resources	• Personnel files and employment contracts • Contractor agreements and screening records • Medical aid and pension or provident fund records • Salary and leave records • Disciplinary code and disciplinary records • Training records and training manuals
Finance	• Receipts, payments and invoices • Bank statements • Debtors and creditors lists • Budgets and management accounts • Asset register
Risk and compliance	• Risk Management and Compliance Programme (FIC Act) • POPIA and PAIA records, policies and procedures • Business risk assessments and compliance reviews • Contracts, including Operator agreements • IT usage and equipment records
Other	• Supplier lists • Address and telephone lists • Marketing and media records

Note on client records: client records are confidential and contain Personal Information and commercial information of clients and third parties. Access by anyone other than the client (or a person authorised by the client) will normally be refused on the grounds in section 11. Information relating to any report made to the Financial Intelligence Centre may not be disclosed (section 29 of the FIC Act).

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purposes of Processing

Munrofin Processes Personal Information in the ordinary course of its business, including to:

9.1.1 provide accounting, tax, payroll, advisory and business registration services requested by clients;

9.1.2 identify and verify clients, assess risk, screen against sanctions lists and meet its other obligations under the FIC Act;

9.1.3 comply with tax, company and labour law and respond to lawful requests from regulators;

9.1.4 manage relationships with clients, prospective clients, suppliers and service providers;

9.1.5 manage contracts, quotations, invoices and accounts, and resolve disputes;

9.1.6 carry out human resources and finance functions, including the recruitment and screening of employees and contractors;

9.1.7 procure goods and services; and

9.1.8 operate its website, including displaying content properly and keeping the website safe and secure.

9.2 Categories of Data Subjects and of Personal Information

Categories of Data Subjects	Personal Information that may be Processed
Clients and prospective clients (individuals)	Names, identity or passport numbers, contact details, addresses, tax numbers, financial, tax and banking information, FICA documents, PEP declarations and screening results.
Clients (companies, close corporations, trusts and partnerships)	Names, registration numbers, addresses, VAT and tax numbers, financial information, and the details of directors, members, trustees, partners, beneficial owners and authorised persons.
Employees of clients (payroll services)	Names, identity numbers, contact details, remuneration, deductions, benefits, tax and UIF information, banking details.
Employees, contractors and job applicants	Names, identity numbers, contact details, addresses, qualifications, CVs, references, banking details, next-of-kin details, screening results including criminal record checks (with consent).
Service providers and suppliers	Names, registration and VAT numbers, contact details, addresses and banking details.
Website visitors	Information submitted through the website and basic technical information such as device and browser type.

9.3 Recipients of Personal Information

Category of Personal Information	Recipients or categories of recipients
Tax information	South African Revenue Service (SARS)
Company and trust information	Companies and Intellectual Property Commission (CIPC); the Master of the High Court
FICA information and statutory reports	Financial Intelligence Centre (FIC) and, where required, the supervisory body
Payroll and UIF information	Department of Employment and Labour / Unemployment Insurance Fund; SARS; banks (for salary payments)
Identity information for verification	Department of Home Affairs and identity verification service providers
Identity information for criminal checks (employees and contractors)	South African Police Service and/or accredited vetting agencies
Qualifications	South African Qualifications Authority and professional bodies
Credit and payment history (where required)	Credit bureaus

Category of Personal Information	Recipients or categories of recipients
Client and practice information	Professional advisers and auditors; Munrofin's professional body (practice reviews); cloud software, storage and AI assistance providers (Operators)

9.3.1 Munrofin discloses Personal Information to service providers only for legitimate business purposes, in accordance with the law and subject to professional and regulatory confidentiality requirements.

9.3.2 Service providers who Process Personal Information on Munrofin's behalf are Operators. Munrofin concludes written agreements with them requiring them to use the information only for the purpose for which it was provided, to keep it confidential and secure, and to notify Munrofin immediately of any security compromise.

9.3.3 Munrofin may disclose Personal Information where it has a legal duty to do so or where necessary to protect its rights, including in litigation.

9.4 Planned transborder flows of Personal Information

Some of Munrofin's cloud service providers, such as Microsoft 365/OneDrive, Sage and Anthropic (Claude, an AI assistance service), may store or Process Personal Information outside the Republic. Munrofin transfers Personal Information outside the Republic only where section 72 of POPIA permits it, for example where the recipient is subject to a law, binding corporate rules or an agreement that provides an adequate level of protection.

9.5 Information security measures

9.5.1 Munrofin maintains reasonable technical and organisational measures to protect Personal Information against loss, damage, unauthorised destruction and unlawful access or Processing, including: access controls, unique user accounts and multi-factor authentication; encrypted devices and access-restricted cloud storage with regular backups; confidentiality obligations, screening and training for employees and contractors; written Operator agreements; locked storage and secure destruction of paper records.

9.5.2 Munrofin reviews its security measures regularly. If there are reasonable grounds to believe that Personal Information has been accessed or acquired by an unauthorised person, Munrofin will notify the Regulator and the affected Data Subjects as soon as reasonably possible, as required by section 22 of POPIA.

9.6 Objection to Processing

9.6.1 In terms of section 11(3) of POPIA and regulation 2 of the POPIA Regulations, a Data Subject may object to the Processing of his, her or its Personal Information by submitting Form 1 of the POPIA Regulations to the Information Officer.

9.7 Correction or deletion of Personal Information

9.7.1 In terms of section 24 of POPIA and regulation 3 of the POPIA Regulations, a Data Subject may ask Munrofin to correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or to destroy or delete a record that Munrofin is no longer authorised to keep, by submitting Form 2 of the POPIA Regulations to the Information Officer.

10. AVAILABILITY OF THE MANUAL

10.1 This Manual is available:

- on Munrofin's website, https://munrofin.co.za;
- at Munrofin's office for public inspection during normal business hours;
- to any person on request, against payment of the prescribed fee for a copy; and
- to the Regulator on request.

10.2 A fee for a printed copy of this Manual is payable per A4 page, as prescribed in Annexure B to the PAIA Regulations (currently R2.00 per page).

11. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

11.1 Munrofin will consider every request in terms of section 50 of PAIA, which provides that a requester must be given access to a record of a private body if the record is required for the exercise or protection of any rights, the requester complies with the procedural requirements of PAIA, and access is not refused on any ground in Chapter 4 of Part 3 of PAIA.

11.2 If Munrofin refuses access, it will give the requester written reasons. The main grounds for refusal are:

Ground for refusal	Description
Protection of the privacy of a third party who is a natural person (section 63)	Access may be refused if disclosure would involve the unreasonable disclosure of Personal Information about a third party, including a deceased individual.
Protection of commercial information of a third party (section 64)	Access may be refused if the record contains a third party's trade secrets; financial, commercial, scientific or technical information likely to cause harm to the third party's commercial or financial interests if disclosed; or information supplied in confidence that could disadvantage the third party in negotiations or commercial competition.
Protection of confidential information of a third party (section 65)	Access may be refused if disclosure would constitute a breach of a duty of confidence owed to a third party in terms of an agreement.
Protection of the safety of individuals and property (section 66)	Access may be refused if disclosure could reasonably be expected to endanger the life or physical safety of an individual, or to prejudice the security of a building, structure, system (including a computer or communication system), means of transport or other property, or arrangements for the protection of individuals or the public.
Records privileged from production in legal proceedings (section 67)	Access may be refused if the record is privileged from production in legal proceedings, unless the privilege has been waived.
Commercial information of Munrofin (section 68)	Access may be refused if the record contains Munrofin's trade secrets; financial, commercial, scientific or technical information likely to cause harm to its commercial or financial interests; information that could put it at a disadvantage in negotiations or commercial competition; or a computer program owned by Munrofin.
Research information (section 69)	Access may be refused if the record contains information about research by or for a third party or Munrofin, the disclosure of which would be likely to expose the third party, Munrofin, the researcher or the subject of the research to serious disadvantage.

12. HOW TO MAKE A REQUEST AND THE REQUEST PROCESS

12.1 To request access to a record, the requester must:

- complete Form 2 (Annexure A) and address it to the Information Officer by e-mail or by hand at the address in section 4;
- provide enough detail to identify the record(s) requested, the requester (and, if an agent is acting, proof of authority), the form of access required, and a postal or e-mail address in the Republic;

- state the right the requester wishes to exercise or protect, and explain why the record is required for that purpose;
- state any additional way in which the requester wishes to be informed of the decision; and
- pay the request fee (if applicable, see section 13).

12.2 The request process:

1	The requester submits Form 2 to the Information Officer, with proof of identity and payment of the request fee (if applicable).
2	The Information Officer decides on the request within **30 days** of receiving it, and gives notice of the decision on Form 3 (Annexure B).
3	The Information Officer may extend this period once, by up to a further **30 days**, in the circumstances allowed by section 57 of PAIA, and will notify the requester of the extension and the reasons.
4	If the Information Officer does not respond within the required period, the request is regarded as refused.
5	If access is granted, the requester pays the access fee (and any deposit) and access is given in the form requested, where reasonably possible.
6	If access is refused, the requester may lodge a complaint with the Information Regulator (see section 14).

13. PRESCRIBED FEES

13.1 The fees payable are those prescribed in Annexure B to the PAIA Regulations, 2021 (fees in respect of private bodies). The full fee schedule is available on the Regulator's website.

13.2 A request fee of **R140.00** is payable before a request will be processed, except where the requester seeks access to a record containing his or her own Personal Information (a personal requester).

13.3 If the request is granted, an access fee is payable for reproducing the record and for the time reasonably required to search for and prepare it (R145.00 for each hour or part of an hour, excluding the first hour, up to a maximum of R435.00), plus postage or delivery at actual cost.

13.4 If the search for and preparation of the record will take more than six hours, a deposit of one third of the access fee may be required.

13.5 Records may be withheld until all fees have been paid. A requester may lodge a complaint with the Regulator, or apply to court, against the payment of the request fee or the deposit.

14. REMEDIES IF A REQUEST IS REFUSED

14.1 **No internal appeal:** PAIA does not provide for an internal appeal against a decision of a private body. The decision of the Information Officer is final within Munrofin.

14.2 **Complaint to the Information Regulator:** a requester or third party who is dissatisfied with a decision of the Information Officer (including a refusal, a decision on fees, an extension of time or a deemed refusal) may lodge a complaint with the Regulator on Form 5 within **180 days** of the decision, in terms of section 77A of PAIA.

14.3 **Application to court:** a requester or third party may apply to court only after exhausting the complaint procedure with the Regulator, within 180 days, in terms of section 78 of PAIA.

Information Regulator contact details:

Information Regulator	Information Regulator (South Africa)
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 / 0800 017 160 (toll free)
Complaints (POPIA)	POPIAComplaints@inforegulator.org.za
Complaints (PAIA)	PAIAComplaints@inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

15. UPDATING OF THE MANUAL

The Information Officer will review this Manual at least once a year and update it whenever Munrofin's details, records or Processing activities change, or the law requires it.

Version	Date	Changes
1	June 2026	Manual compiled
2	November 2026	Remedies corrected (complaint to the Regulator within 180 days; no internal appeal); client records added; recipients, Data Subjects and legislation updated; request process and fees set out; Regulator contact details updated; Deputy Information Officer reference removed; AI assistance provider (Anthropic) added; corrections

Issued by the Information Officer of Munrofin (Pty) Ltd:

Name and surname	Maria Johanna (Maryna) Munro
Title	Director and Information Officer
Date	23 November 2026
Signature	

ANNEXURE A – FORM 2: REQUEST FOR ACCESS TO RECORD

[Regulation 7 of the PAIA Regulations, 2021]

Note: 1. Proof of identity must be attached by the requester. 2. If the request is made on behalf of another person, proof of authority must be attached.

TO: The Information Officer	Munrofin (Pty) Ltd – MJ Munro
Address	1015 Draaibos Avenue, Weltevredenpark X45, Roodepoort, 1709
E-mail	maryna@munrofin.co.za
Telephone	082 315 3350

☐ Request is made in my own name ☐ Request is made on behalf of another person

Personal information of requester

Full names	
Identity number	
Capacity in which request is made (if on behalf of another person)	
Postal address	
Street address	
E-mail address	
Contact numbers (tel. and cell)	

Person on whose behalf the request is made (if applicable)

Full names	
Identity number	
Postal address	
Street address	
E-mail address	
Contact numbers (tel. and cell)	

Particulars of record requested

Give full particulars of the record requested, including the reference number if known. If the space is not enough, continue on a separate signed page.

Description of record or relevant part of the record	

Reference number, if available	
Any further particulars of record	

Type of record (mark with an "X")

Record is in written or printed form	☐
Record comprises virtual images (photographs, slides, video recordings, computer-generated images, sketches, etc.)	☐
Record consists of recorded words or information which can be reproduced in sound	☐
Record is held on a computer or in an electronic or machine-readable form	☐

Form of access (mark with an "X")

Printed copy of record (including copies of virtual images, transcriptions and electronic information)	☐
Written or printed transcription of virtual images	☐
Transcription of soundtrack (written or printed document)	☐
Copy of record on flash drive (including virtual images and soundtracks)	☐
Copy of record on compact disc (including virtual images and soundtracks)	☐
Copy of record saved on cloud storage server	☐

Manner of access (mark with an "X")

Personal inspection of record at the registered address of Munrofin	☐
Postal services to postal address	☐
Postal services to street address	☐
Courier service to street address	☐
E-mail of information (including soundtracks if possible)	☐
Cloud share / file transfer	☐
Preferred language (if the record is not available in this language, access may be given in the language in which it is available): _____	

Particulars of right to be exercised or protected

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of that right	

Fees

(a) A request fee must be paid before the request will be considered (not payable by a personal requester). (b) You will be notified of the access fee payable. (c) The access fee depends on the form of access and the time reasonably required to search for and prepare the record. (d) If you believe you qualify for exemption from any fee, state the reason: _____

You will be notified in writing whether your request has been approved or denied. Preferred manner of correspondence: ☐ Postal address ☐ E-mail ☐ Cell number ☐ Other: _____

Signed at _____ this _____ day of _____ 20____.

_____

Signature of requester / person on whose behalf request is made

For official use

Reference number	
Request received by (name and surname of Information Officer)	
Date received	
Access fees	
Deposit (if any)	
Signature of Information Officer	

ANNEXURE B – FORM 3: OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8 of the PAIA Regulations, 2021]

Note: 1. If your request is granted: (a) the deposit (if any) is payable before your request is processed; and (b) the requested record or part of the record will be released only once proof of full payment is received. 2. Please use the reference number below in all future correspondence.

Reference number	
To (requester)	
Address / e-mail	
Your request dated	

1. You requested personal inspection

Personal inspection of information at the registered address of Munrofin (including listening to recorded words and viewing electronic information)	☐

2. Or you requested copies

Printed copies of the information	☐
Written or printed transcription of virtual images	☐
Transcription of soundtrack	☐
Copy of information on flash drive	☐
Copy of information on compact disc	☐
Copy of record saved on cloud storage server	☐

3. To be submitted by

Postal services to postal address	☐
Postal services to street address	☐
Courier service to street address	☐
E-mail of information	☐
Cloud share / file transfer	☐
Preferred language: _____	

Your request has been: ☐ Approved ☐ Denied, for the following reasons:

_____

__

_____

__

4. Fees payable

Item	Amount (Annexure B to PAIA Regulations, 2021)	Number of pages / items	Total
Request fee (not payable by a personal requester)	R140.00		
Photocopy / printed black and white copy, per A4 page	R2.00 per page or part		
Printed copy, per A4 page	R2.00 per page or part		
Copy in computer-readable form on flash drive (provided by requester)	R40.00		
Copy in computer-readable form on compact disc (provided by requester / provided to requester)	R40.00 / R60.00		
Transcription of visual images, and copy of visual images	Service to be outsourced; depends on the quotation of the service provider		
Transcription of an audio record, per A4 page	R24.00		
Copy of an audio record on flash drive (provided by requester)	R40.00		
Copy of an audio record on compact disc (provided by requester / provided to requester)	R40.00 / R60.00		
Search and preparation, per hour or part of an hour (excluding the first hour)	R145.00 (maximum R435.00)		
Postage, e-mail or other electronic transfer	Actual expense, if any		
TOTAL			

5. Deposit payable (if search exceeds six hours)

☐ Yes ☐ No	
Hours of search	
Amount of deposit (one third of the total amount)	

The amount must be paid into the bank account of Munrofin (Pty) Ltd, the details of which will be provided with this notice.

Signed at _____ this _____ day of _____ 20____.

_____

Signature of Information Officer